

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

WILLIAM SOTO, DOMINGO TOLENTINO,
and LUIS VIRUET, individually and on behalf of
all persons similarly situated,

Plaintiffs,

-against-

HOUSLANGER & ASSOCIATES, PLLC, TODD
HOUSLANGER and BRYAN BRYKS,

Defendants.

No. 19 Civ. 6691 (RKP)(SJB)

**DECLARATION OF BRYN BRIDLEY WITH REGARD TO NOTICE DISTRIBUTION
AND SETTLEMENT ADMINISTRATION**

1. I am the Director of Project Management at Atticus Administration, LLC (“Atticus”), a firm providing class action and claims administration services. I have extensive experience with class action notice and claims administration. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement with the above-captioned action.

2. Atticus is the Class Administrator for the above-captioned action and is responsible for carrying out the terms of the *Stipulation of Settlement and Release as to all Claims Against All Defendants* (“Settlement Agreement”) pursuant to the order entered by the Court on July 11, 2022.

3. I submit this Declaration to inform the parties and the Court of settlement administration activities completed to date. This Declaration describes: (i) the class list, (ii) the methods of providing notice to Settlement Class Members, (iii) the settlement website and toll-free information line, (iv) the receipt and processing of claim forms, (v) the receipt and validation of exclusion requests and settlement objections, (vi) estimated Settlement Class Member Awards, and (vii) a summary of the Administration Expenses associated with this Action.

I. THE CLASS LIST

4. On June 22, 2021, Atticus received a file from Class Counsel that included the complete name, last known address, telephone number(s), email address, and the last four digits of the social security number, as well as information related to each person's applicable judgment(s) for 3,196 individuals against whom Houslanger & Associates, PLLC, Todd Houslanger, and Bryan Bryks (collectively "Defendants") issued an execution on an assigned judgment obtained in New York City Civil Court on or after April 19, 2016 ("Settlement Class Members," the "Settlement Class," or the "Class List"). Atticus reviewed the data and found no issues with its content. The final Class List contained 3,196 Class Members.

5. Under the terms of the Settlement Agreement, Defendants agreed to stop collecting on Class Member judgments ("injunctive relief" and "Injunctive Relief Group"). Class Members who paid more than \$1,000 in connection with the execution of an assigned judgment or appeared in Court to challenge the execution issued by Defendants, or both, could submit a Claim Form to get a refund of some of the money paid to Defendants (the "Compensation Group Class Members"). The Settlement Class includes 2,289 Compensation Group Class Members and 907 Injunctive Relief Group Class Members.

6. In anticipation of mailed notice needs and distribution of Settlement Class Member Awards, the Class List was processed through the National Change of Address database maintained by the United States Postal Service ("USPS"). This process updates addresses for individuals that have moved within the last four (4) years and who have filed a change of address card with the USPS.

II. NOTICE TO THE CLASS

8. The *Notice of Class Action Settlement and Fairness Hearing* ("Class Notice") was distributed to Class Members pursuant to the terms of the Settlement Agreement. The Class

Notices were unique to the injunctive and compensation class designations. The notices provided a summary of the settlement and its terms, informed Class Members of their rights and options and the deadlines by which they were required to act on those options, the Fairness Hearing date, and where to obtain more information, including the settlement website and toll-free line maintained by Atticus. Copies of the complete Compensation and Injunctive Relief Class Notices are attached to this Declaration as **Exhibit A**.

9. On July 22, 2022 Atticus caused the Class Notice to be sent by email to 943 Class Members – 702 were emailed to Compensation Group Class Members and 241 were sent to members of the Injunctive Relief Group – for whom email addresses were provided. Of the 943 notices sent by email, 805 were successfully delivered, 437 were opened, and 138 “bounced” and could not be delivered. Two (2) Class Members unsubscribed from receiving any further emails upon receipt of the initial Class Notice email.

10. On July 22, 2022, Atticus also caused a text message stating “*You may be part of a class action settlement about debt collection by Houslanger & Associates. To learn more, visit www.HouslangerSettlement.com*” to be sent to 3,408 unique telephone numbers included in the Class List¹. Of the 3,408 text messages sent, 1,211 (35.53%) were successfully delivered and 2,197 (64.47%) “bounced” and could not be delivered.

11. On August 5, 2022, Atticus caused a short-form version of the Notice (“Postcard Notice”) to be sent via U.S. first-class mail to 2,507 Class Members – 1,749 were sent the compensation Postcard Notice and 758 were sent the injunctive relief Postcard Notice. The Postcard Notice was sent by mail to all Class Members who had been sent an email that bounced, an email that remained unread at the time the Postcard Notice was prepared, and/or who had been

¹ The Class List included multiple telephone numbers for some Class Member records but did not include any indication of whether the numbers were cellular numbers capable of receiving text messages. Therefore, distribution of the text message was attempted to all telephone numbers received.

sent a text message that was not delivered. The Postcard Notices provided Class Members with a condensed version of the Class Notice and referred them to the settlement website for more information. Copies of the Postcard Notices are attached to this declaration as **Exhibit B**.

12. Of the 2,507 Postcard Notices sent by mail, 251 were returned to Atticus as undeliverable. One (1) of the undeliverable postcards included forwarding information and the postcard was promptly remailed to the forwarding address. Two hundred thirty-nine (239) undeliverable records were sent to a professional service for address tracing where 173 new addresses were obtained, and postcards were promptly remailed to the 173 new addresses obtained. New addresses were not found for the other 66 records sent to trace and postcards could not be resent. Eleven (11) undeliverable records were not sent to trace – six (6) because they were returned to Atticus at or after the Class Member response deadline. Thus, 2,430 or 96.93% of the mailed Postcard Notices were successfully sent.

13. On August 24, 2022, Atticus had a conversation with Class Counsel about the claim rate for Class Members as of that date. Class Counsel expressed concerns about the number of claims filed, and directed Atticus to take the following additional steps in an attempt to prompt more Class Members to file claims. On August 29, 2022, Atticus caused a “Reminder Notice” to be sent by email and text to all Compensation Group Class Members who had not yet submitted claims. The reminders informed Class Members that they were eligible to receive payments from a class action settlement, provided a web link to submit a claim, and gave the deadline for submitting a claim. On September 6, 2022, Atticus caused a postcard “Reminder Notice” to be sent by mail to all Compensation Group Class Members who had not yet submitted claims. The reminder informed Class Members that they were eligible to receive payments from a class action settlement, how to submit a claim, gave the deadline for submitting a claim, and provided the

unique credentials each would need to access and submit an online claim. Copies of the Reminder Notice postcard, email, and text message are attached hereto as **Exhibit C**.

14. The Reminder Notice was issued to each Compensation Group Class Member using each of the methods of communication available for each individual. In total, 2,124 reminders were sent by mail, 627 by email, and 2,353 by text.

III. SETTLEMENT WEBSITE AND TOLL-FREE INFORMATION LINE

15. Pursuant to the terms of the Settlement, Atticus established a website at the URL www.HouslangerSettlement.com (the “Settlement Website”). The website was made public prior to the distribution of email Notices and text messages on July 22, 2022. The URL was included in the email, text, and postcard notices and provides Class Members with access to additional information about the settlement including answers to frequently asked questions, important settlement dates, and access to settlement documents including the long-form Compensation and Injunctive Relief Class Notices. The website also included online Claim Form filing for Compensation Group Class Members. As of September 26, 2022, the website has received 1,508 visits and continues to remain operational at this time. Updates on the status of the Final Approval Hearing and the distribution of Settlement Class Member Awards will be posted on the Settlement Website as they become available.

16. Atticus also activated the toll-free number at 1-800-578-9164 on July 22, 2022. Callers are provided the opportunity to leave a voicemail message with their specific questions have receive a return telephone call from an Atticus customer support specialist. As of September 26, 2022, a total of 28 calls have been received on the toll-free line and the line remains in operation at this time. No Class Members have expressed concerns about the fairness of the Settlement.

IV. CLAIM FORMS PROCESSING

17. Compensation Group Class Members who paid more than \$1,000 in connection with the execution of an assigned judgment or appeared in Court to challenge the execution issued by Defendants, or both, had the opportunity to submit an online a claim to qualify to receive a payment, including a refund of some of the money that was paid to Defendants. At this time, late claims are being accepted, at the direction of Class Counsel, for further consideration. The original Claim Submission Deadline was September 20, 2022.

18. As of September 26, 2022, 301 claims have been submitted by Compensation Group Class Members (“Eligible Claimants”), of which 290 have been deemed valid and 11 were determined to be duplicate submissions from Compensation Group Class Members who already had valid claim submissions on record.

V. EXCLUSION REQUESTS AND SETTLEMENT OBJECTIONS

19. The deadline for requesting exclusion from or filing objections to the Settlement was September 20, 2022. Atticus received one (1) timely opt-out request from Ramon A. Galeas, and Class Counsel forwarded one (1) objection from Class Member Diana Farmer to our office for processing. Copy of the timely opt-out are attached hereto as **Exhibit D**.

V. ESTIMATED CLASS MEMBER AWARDS

20. After payments for the Service Awards, Approved Attorneys’ Fees and Administration Expenses are paid from the \$155,000.00 Settlement Amount, a minimum of \$69,883 of the remaining funds or “Net Settlement Amount” will be distributed to Eligible Claimants pursuant to the Allocation Plan.

21. Pursuant to the Allocation Plan, each Eligible Claimant will receive a payment of \$50.00. Atticus will allocate the funds remaining in the Net Settlement Amount after the \$50 per capita designation pro rata according to how much money each claimant paid to the Defendants

(the “Refund Payment”) according to the amount reflected in Defendants’ records as of May 24, 2022 unless otherwise challenged and proven by an Eligible Claimant.

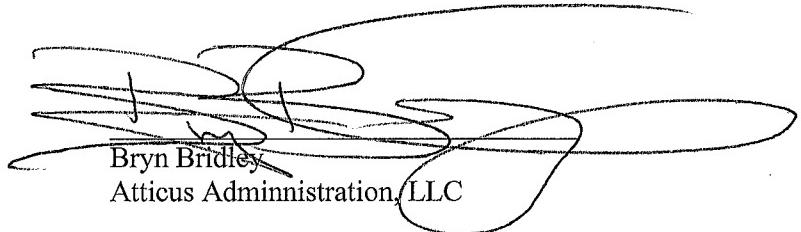
22. If the valid claims currently on record constitute the final claims list, the pro rata Refund Payments to Claimants, which would be paid on top of the \$50 per capita payments, would equal 4.76% of the money that Compensation Group Class Members paid to Defendants, ranging from \$2.29 to \$2,141.74. The average Refund Payment amount to Eligible Claimants would be \$207.73 for an average award of \$229.12 [average Refund plus \$50]. Atticus will finalize the valid claims and Eligible Claimants for payment lists upon the Court’s entry of a Final Approval Order.

VII. SETTLEMENT ADMINISTRATION COSTS

24. Allowing for a \$765 discount, Atticus agreed to administer the terms of the settlement for the capped amount of \$20,500. A detailed breakdown of the costs for the Settlement Administration duties as set forth in the Settlement Agreement are as follows: \$5,614 for sending Notice, \$6,044 for project set-up and project management, \$1,419 for claims processing, \$4,455 for communications set-up and correspondence, \$1,040 for setting up a qualified settlement fund entity (QSF), obtaining a federal tax identification number, opening a bank account for the QSF, and \$4,112 for calculating and distributing Class Member Awards.

25. As quoted, the estimate did not include the distribution any type of reminder notices to the Compensation Group Class Members. The parties agreed to a \$1,700 scope increase to cover the costs associated with dissemination of the Reminder Notice by mail, email, and text. Thus, the Administration Expenses associated with this project are \$22,200.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. This Declaration was executed on the September 29, 2022 in Mendota Heights, Minnesota.



Bryn Bridley
Atticus Administration, LLC

EXHIBIT A

NOTICE OF CLASS ACTION SETTLEMENT AND FAIRNESS HEARING

*Soto v. Houslanger & Associates, PLLC, et. al., No. 19 Civ. 6691
United States District Court for the Eastern District of New York*



- You are receiving this notice because you are part of a proposed settlement of a class action lawsuit.
- On <>Judgment Date<>, you had a consumer debt judgment entered against you in New York City Civil Court, <>County<> County, in the case <>Plaintiff<> v. <>First Name<> <>Last Name<>, Index Number <>Index Number<>.
- At some point between 2016 and 2022, the law firm Houslanger & Associates, PLLC executed on that judgment by garnishing your wages or restraining your bank account.
- Defendants have not admitted to any wrongdoing but if the Settlement is approved by the Court, **Defendants have agreed to stop collecting on your judgment forever.** (But it is possible that someone else may collect on your judgment in the future. If you have a collection issue and need help understanding your rights under the Settlement, call the number or visit the website below.)
- Defendants have also agreed that they will permanently stop collecting on the judgments entered against all other Class Members who participate in the Settlement, and will also stop collecting on certain additional New York City Civil Court judgments.
- Defendants have agreed to pay \$155,000 as part of the Settlement. The lawyers representing the Class Members think this is a good settlement because Defendants have limited money and it might be impossible to get any money from them later, plus Defendants will permanently stop collecting on thousands of judgments, including the judgment against you.
- But, you cannot get money from this settlement award, because Defendants' records show that you paid them less than \$1,000 and did not appear in Court to challenge the judgment. **If you think this is wrong – and that you did pay more than \$1,000, please call 1-800-578-9164.**
- Please read this Notice carefully because your rights are affected whether you act or do nothing.
- If you have questions about this Settlement, visit www.HouslangerSettlement.com or call 1-800-578-9164.

MORE INFORMATION HERE: www.HouslangerSettlement.com

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
You May	What This Means	Due Date
Do Nothing	Defendants will stop collecting on your judgment, <i>but</i> you will give up all your rights to sue the Defendants on your own about the execution on your judgment.	None
Opt Out	Defendants may keep collecting your judgment. <i>But</i> you could sue the Defendants on your own, at your own expense.	September 20, 2022
Object	You must tell the court, in writing, what you do not like about the Settlement. Even if you object, you will get the benefits described above, as long as you do not opt out.	September 20, 2022

1. Why am I getting this Notice?

You are part of a Class Action Settlement in a case brought by three consumers against the law firm Houslanger & Associates, PLLC and two of its attorneys, Todd Houslanger and Bryan Bryks (the Defendants). This case is on behalf of all consumers like you who: (a) had a judgment entered against them in New York City Civil Court; (b) that judgment was later sold or transferred to another company; and (c) on or after April 19, 2016, Defendants issued an Execution on that judgment in order to garnish your wages or restrain your bank account. This case is about whether Defendants' practices were lawful or unlawful.

Both sides have agreed to a settlement. Right now, the lawyers are *proposing* the Settlement. After hearing from Class Members like you, the Court will decide whether to *approve* the Settlement. You are getting this Notice so that you may decide what steps you wish to take with the proposed Settlement.

2. If the Settlement is approved and I don't opt out, what would I get?

No More Collections from Defendants: Defendants have agreed to stop collecting on your judgment forever. However, another company may be able to collect on the judgment against you in the future, and if that happens, you keep all of your rights to challenge that collection.

The lawyers representing the Class believe that this is a good settlement and will give valuable benefits to you and the other Class Members.

3. If the Settlement is approved, will I get money?

No. The Defendants have agreed to pay \$155,000 as a settlement award. Some of this money will be paid to Class Members who paid Defendants more than \$1,000 or who appeared in Court to challenge the collections by Defendants (each of those Class Members will get a payment of approximately \$50 or more). You cannot get money from this settlement, because the records show that you paid Defendants less than \$1,000 and did not appear in Court to challenge the collection. **If you think the records are wrong – and that you did pay the Defendants more than \$1,000 or did appear in Court to challenge the collection – call the Class Administrator at 1-800-578-9164.**

The remaining money will be used to pay: the consumers who brought this case or helped with this case for their time and effort (up to \$11,250); the costs of administering this settlement (sending this Notice, processing claim forms, etc.) (up to \$20,500); and the lawyers who brought this case (approximately \$51,667).

4. Do I have a lawyer in the case? How will the lawyers be paid?

The lawyers representing the Class Members are the New York Legal Assistance Group (NYLAG), a non-profit legal services organization. You do not have to pay for these lawyers, and you do not need to hire your own lawyer in order to participate as a Class Member. If you want to be represented by your own lawyer, you may hire one at your own expense. The lawyers have not yet been paid for their work on this case. The lawyers will apply to the Court for an award of approximately \$51,666, which is one-third of the settlement amount. The Court will decide whether to pay Class Counsel this full amount.

5. Why do those lawyers think this is a good Settlement?

The lawyers representing the Class Members think this is a good settlement because Defendants have limited money. The lawyers for the Class have confirmed this by looking at Defendants' financial records. Plus, importantly, as part of the Settlement, Defendants have agreed that they will not collect any more money from the judgments against Class Members and will stop collecting on other New York City Civil Court judgments. If the Parties did not enter this Settlement, it could take years for the case to finish, and Defendants could continue collecting on the judgments during this time.

6. What should I do if someone tries to collect on the judgment against me?

Under the Settlement, Defendants are not allowed to collect on your judgment. In addition, under the Settlement, you would keep all of your rights to challenge any future collection by anyone other than Defendants, and your rights against the owners of the judgment against you. If you face collection on the judgment against you in the future and need help understanding your rights under the Settlement, you may contact the lawyers for the Class, who can advise you at no charge.

7. What happens if the Settlement is not approved?

If the Settlement is not approved, the case will go forward in court. No one will get any money from the Settlement and Defendants may continue to collect money from Class Members, including you. If the case kept going, the Defendants might win, and Class Members would get nothing at all. Or the Class Members might win and get more money than what they would get under this Settlement. It is impossible to predict.

8. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, Court Room 324 North on October 11, 2022, at 12:00 p.m. to decide whether to approve the Settlement. Any Class Member, including you, can attend the hearing to say what you think. You do not need to attend the Fairness Hearing to benefit from the Settlement or receive a payment, but you can go if you want to. It is completely up to you. If you want to speak at the Fairness Hearing to object to the settlement, you need to submit a written objection by September 20, 2022, by following the instructions below. If you want to speak about anything else at the Fairness Hearing, you need to sign up by September 20, 2022 by contacting Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or sending an email to HouslangerSettlement@atticusadmin.com and explaining what you want to say. Anyone can attend the Fairness Hearing, and to attend you don't need to sign up in advance.

9. How do I opt out or object to the Settlement?

To opt out of the Settlement, you must send a letter stating that you want to opt out of the Settlement in *Soto v. Houslanger & Associates, PLLC, et. al.*, No. 19 Civ. 6691. You must include your name, address, telephone number, email address, and physical or electronic signature. Your opt-out request must be postmarked no later than September 20, 2022 and sent to the following address: Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or emailed to HouslangerSettlement@atticusadmin.com.

To object, you must send a letter with: your name, address, telephone number, email address, and physical or electronic signature; a statement saying that you object to the Settlement in *Soto v. Houslanger & Associates, PLLC, et. al.*, No. 19 Civ. 6691; the reasons you object; and whether you want to speak at the Fairness Hearing. Your objection must be postmarked no later than September 20, 2022 and sent to the following address: Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or emailed to HouslangerSettlement@atticusadmin.com.

10. How can I get more information?

This Notice summarizes the proposed Settlement. More details about the Settlement and the lawsuit are available at www.HouslangerSettlement.com. If you have any questions about this Notice or the Settlement, you should not contact Defendants. Instead, please contact Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164, by email to HouslangerSettlement@atticusadmin.com, or by phone at 1-800-578-9164.

NOTICE OF PAYMENT ELIGIBILITY AND CLASS ACTION SETTLEMENT

*Soto v. Houslanger & Associates, PLLC, et. al., No. 19 Civ. 6691
United States District Court for the Eastern District of New York*



- You are receiving this notice because you are part of a proposed settlement of a class action lawsuit.
- On <>Judgment Date<>, you had a consumer debt judgment entered against you in New York City Civil Court, <>County<> County, in the case <>Plaintiff<> v. <>First Name<> <>Last Name<>, Index Number <>Index Number<>.
- At some point between 2016 and 2022, the law firm Houslanger & Associates, PLLC executed on that judgment by garnishing your wages or restraining your bank account. This case is about whether that execution was proper.
- Defendants have not admitted to any wrongdoing but have agreed to pay \$155,000 as part of the Settlement.
- Defendants have also agreed that they will permanently stop collecting on the judgments entered against you and all other Class Members who participate in the Settlement, and will also stop collecting on certain additional New York City Civil Court judgments.
- The lawyers representing the Class Members think this is a good settlement because Defendants have limited money and it might be impossible to get any money from them later, plus Defendants will permanently stop collecting on thousands of judgments, including the judgment against you.
- If the Settlement is approved by the Court and you submit a Claim Form by September 20, 2022, **you will get a payment that will likely be at least \$50, plus a refund of some of the money that you paid to Defendants.** The exact amount you get will depend on the number of eligible Class Members who file a claim.
- If the Settlement is approved by the Court, in addition to your refund, **Defendants will stop collecting on your judgment forever.** (But it is possible that someone else may collect on your judgment in the future. If you have a collection issue and need help understanding your rights under the Settlement, call the number or visit the website below.)
- Please read this Notice carefully because your rights are affected whether you act or do nothing.
- If you have questions about this Settlement, visit www.HouslangerSettlement.com or call 1-800-578-9164.

SUBMIT CLAIM FORM HERE:

[LINK TO CLAIM FORM]

MORE INFORMATION HERE:

www.HouslangerSettlement.com

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
You May	What This Means	Due Date
Submit a Claim Form	This is the only way for you to get money from the Settlement! If you submit a valid Claim Form and the Settlement is approved, you will get a payment and Defendants will stop collecting on your judgment. <i>But</i> , you will give up your rights to sue the Defendants on your own about the execution on your judgment.	September 20, 2022
Opt Out	You will not get any money from the Settlement. Defendants may keep collecting your judgment. But you could sue the Defendants on your own, at your expense.	September 20, 2022
Object	You must tell the court, in writing, what you do not like about the Settlement. Even if you object, you will get the benefits described above, as long as you submit a claim form and do not opt out.	September 20, 2022
Do Nothing	<i>You will not get any money from the settlement</i> , and you will give up all your rights to sue the Defendants on your own about the execution on your judgment. But, Defendants will stop collecting on your judgment.	None

1. Why am I getting this Notice?

You are part of a Class Action Settlement in a case brought by three consumers against the law firm Houslanger & Associates, PLLC and two of its attorneys, Todd Houslanger and Bryan Bryks (the Defendants). This case is on behalf of all consumers like you who: (a) had a judgment entered against them in New York City Civil Court; (b) that judgment was later sold or transferred to another company; and (c) on or after April 19, 2016, Defendants issued an Execution on that judgment in order to garnish your wages or restrain your bank account. This case is about whether Defendants' practices were lawful or unlawful.

Both sides have agreed to a settlement. Right now, the lawyers are *proposing* the Settlement. After hearing from Class Members like you, the Court will decide whether to *approve* the Settlement. You are getting this Notice so that you may decide what steps you wish to take with the proposed Settlement.

2. If the Settlement is approved and I don't opt out, what would I get?

Money: Defendants' records show that you paid more than \$1,000 in connection with their execution, or you appeared in Court to challenge the execution, or both. This means that you are eligible to get money from the Settlement. The amount of money that you will get depends on how many Class Members respond to this Notice and how much money was collected from you.

No More Collections from Defendants: Defendants have agreed to stop collecting on your judgment forever. However, another company may be able to collect on the judgment against you in the future, and if that happens, you keep all of your rights to challenge that collection.

The lawyers representing the Class believe that this is a good settlement and will give valuable benefits to you and the other Class Members.

3. How much money would I get?

If you submit a Claim Form by September 20, 2022 and do not opt out, you will get a payment from the Settlement. It is very likely that your payment will be at least \$50, and possibly substantially more.

Specifically, we anticipate distributing \$50 each to every Class Member who fills out a valid Claim Form and paid more than \$1,000 in connection with their execution, or appeared in Court to challenge the execution, or both. But, if too many Class Members submit valid Claim Forms and we cannot provide a \$50 payment to each, we will pay each Class Member an equal payment.

We also anticipate distributing money that is leftover after those \$50 payments so that each of those Class Members also gets a partial refund of what they paid. The exact amount depends on how much they paid and how many Class Members submit Claim Form, but it will likely be approximately 2% to 7% of what they paid to Defendants.

- It might take a while to get a payment, perhaps more than a year, because of the legal processes for getting the settlement approved. Please be patient.

The Settlement Fund will be used to pay: the three consumers who brought this case (up to \$11,250); the costs of administering this Settlement (sending this Notice, processing Claim Forms, etc.) (up to \$20,500); and the lawyers who brought this case (approximately \$51,666).

4. Do I have a lawyer in the case? How will the lawyers be paid?

The lawyers representing the Class Members are the New York Legal Assistance Group (NYLAG), a non-profit legal services organization. You do not have to pay for these lawyers, and you do not need to hire your own lawyer in order to participate as a Class Member. If you want to be represented by your own lawyer, you may hire one at your own expense. The lawyers have not yet been paid for their work on this case. The lawyers will apply to the Court for an award of approximately \$51,666, which is one-third of the settlement amount. The Court will decide whether to pay Class Counsel this full amount.

5. Why do those lawyers think this is a good Settlement?

The lawyers representing the Class Members think this is a good settlement because Defendants have limited money. The lawyers for the Class have confirmed this by looking at Defendants' financial records. Plus, importantly, as part of the Settlement, Defendants have agreed that they will not collect any more money from the judgments against Class Members, and will stop collecting on other New York City Civil Court judgments. If the Parties did not enter this settlement, it could take years for the case to finish, and Defendants could continue collecting on the judgments during this time.

6. What should I do if someone tries to collect on the judgment against me?

Under the Settlement, Defendants are not allowed to collect on your judgment. In addition, under the Settlement, you would keep all of your rights to challenge any future collection by anyone other than Defendants, and your rights against the owners of the judgment against you. If you face collection on the judgment against you in the future and need help understanding your rights under the Settlement, you may contact the lawyers for the Class, who can advise you at no charge.

7. What happens if the Settlement is not approved?

If the Settlement is not approved, the case will go forward in court. No one will get any money from the Settlement and Defendants may continue to collect money from Class Members, including you. If the case kept going, the Defendants might win, and Class Members would get nothing at all. Or the Class Members might win, and get more money than what they would get under this Settlement. It is impossible to predict.

8. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, Court Room 324 North on October 11, 2022 at 12:00 p.m. to decide whether to approve the Settlement. Any Class Member, including you, can attend the hearing to say what you think. You do not need to attend the Fairness Hearing to benefit from the Settlement or receive a payment, but you can go if you want to. It is completely up to you. If you want to speak at the Fairness Hearing to object to the Settlement, you need to submit a written objection by September 20, 2022 by following the instructions below. If you want to speak about anything else at the Fairness Hearing, you need to sign up by September 20, 2022 by contacting Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or sending an email to HouslangerSettlement@atticusadmin.com and explaining what you want to say. Anyone can attend the Fairness Hearing, and to attend you don't need to sign up in advance.

9. How do I submit a Claim Form, opt out, or object to the Settlement?

Submitting a Claim Form is the only way to get money from the Settlement! You can submit a Claim Form online by visiting www.HouslangerSettlement.com. If you want to submit a Claim Form and cannot access the online form, please contact 1-800-578-9164.

To opt out of the Settlement, you must send a letter stating that you want to opt out of the Settlement in *Soto v. Houslanger & Associates, PLLC, et. al.*, No. 19 Civ. 6691. You must include your name, address, telephone number, email address, and physical or electronic signature. Your opt-out request must be postmarked no later than September 20, 2022 and sent to the following address: Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or emailed to HouslangerSettlement@atticusadmin.com.

To object, you must send a letter with: your name, address, telephone number, email address, and physical or electronic signature; a statement saying that you object to the Settlement in *Soto v. Houslanger & Associates, PLLC, et. al.*, No. 19 Civ. 6691; the reasons you object; and whether you want to speak at the Fairness Hearing. Your objection must be postmarked no later than September 20, 2022 and sent to the following address: Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or emailed to HouslangerSettlement@atticusadmin.com.

10. How can I get more information?

This Notice summarizes the proposed Settlement. More details about the Settlement and the lawsuit are available at www.HouslangerSettlement.com. If you have any questions about this Notice or the Settlement, you should not contact Defendants. Instead, please contact Houslanger Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164, by email at HouslangerSettlement@atticusadmin.com, or by phone 1-800-578-9164.

EXHIBIT B

NOTICE OF PAYMENT ELIGIBILITY AND CLASS ACTION SETTLEMENT

Soto v. Houslanger & Associates, PLLC, et al., No. 19 Civ. 6691,
U.S. District Court for the Eastern District of New York

You are receiving this notice because you are part of a proposed settlement of a class action lawsuit. The law firm Houslanger & Associates, PLLC collected on a New York City Civil Court judgment against you by garnishing your wages or restraining your bank account.

If the settlement is approved by the Court and you submit a Claim Form by **September 20, 2022**, **you will get a payment that will likely be at least \$50, plus a refund of some of the money that you paid.** And, Defendants have agreed to stop collecting on the judgment forever. To learn more and submit a claim form, visit:

www.HouslangerSettlement.com

HOUSLANGER SETTLEMENT
C/O ATTICUS ADMINISTRATION
PO BOX 64053
SAINT PAUL, MN 55164



<<Claimant_ID>>

CLAIMANT ID: <<Claimant_ID>>

<<First_Name>> <<Last_Name>>
<<Address1>> <<Address2>>
<<City>> <<State>> <<Zip>>

Why Am I Getting This Notice?

You are part of a Class Action Settlement in a case brought by New York City consumers against a law firm, Houslanger & Associates, PLLC, and two attorneys at the firm. This case is on behalf of a group of consumers (called a "class") like you who had judgments in New York City Civil Court that Defendants collected on by wage garnishment or bank restraint.

Both sides have agreed to a settlement. Right now, the lawyers are proposing a Settlement to the Class and the Court. After hearing from Class Members like you, the Court will decide whether to approve the Settlement.

You are eligible to receive a payment from the settlement that will likely be at least \$50, but to get paid, **you must submit a claim form by September 20, 2022**. Also, as part of the proposed settlement, Defendants have agreed to stop collecting on the judgment against you forever. (But it is possible that someone else may collect on your judgment in the future. For help with that or other questions, visit the website or call the number below).

Your Legal Rights and Options in this Settlement

A. Submit a Claim Form: Submitting a Claim Form is the only way for you to get money! If you submit a valid Claim Form and the Settlement is approved, **you will get a payment** and Defendants will stop collecting on your account. *But, you will give up your rights to sue the Defendants on your own.* Due Date: September 20, 2022.

B. Opt Out: If you opt out, you will not get any money from the Settlement. Defendants may keep collecting your account. But you could sue the Defendants on your own, at your own expense. Due Date: September 20, 2022.

C. Object: To object, you must tell the court, in writing, what you do not like about the Settlement. Even if you object, you will get the benefits described above as long as you submit a claim form and do not opt out. Due Date: September 20, 2022.

D. Do Nothing: If you do nothing, you will not get any money from the settlement, and you will give up your rights to sue the Defendants on your own. *But, Defendants will stop collecting on your account.*

To Learn More and Submit a Claim Form, Visit:

www.HouslangerSettlement.com

If you have other questions, you can contact the settlement administrator at 1-800-578-9164.

NOTICE OF CLASS ACTION SETTLEMENT

Soto v. Houslanger & Associates, PLLC, et al., No. 19 Civ. 6691,
U.S. District Court for the Eastern District of New York

You are receiving this notice because you are part of a proposed settlement of a class action lawsuit. The law firm Houslanger & Associates, PLLC collected on a New York City Civil Court judgment against you by garnishing your wages or restraining your bank account.

If the settlement is approved by the Court, Defendants have agreed to stop collecting on the judgment forever. To learn more, visit:

www.HouslangerSettlement.com

HOUSLANGER SETTLEMENT
C/O ATTICUS ADMINISTRATION
PO BOX 64053
SAINT PAUL, MN 55164



<<Claimant_ID>>

CLAIMANT ID: <<Claimant_ID>>

<<First_Name>> <<Last_Name>>
<<Address1>> <<Address2>>
<<City>> <<State>> <<Zip>>

Why Am I Getting This Notice?

You are part of a Class Action Settlement in a case brought by New York City consumers against a law firm, Houslanger & Associates, PLLC, and two attorneys at the firm. This case is on behalf of a group of consumers (called a "class") like you who had judgments in New York City Civil Court that Defendants collected on by wage garnishment or bank restraint.

Both sides have agreed to a settlement. Right now, the lawyers are proposing a Settlement to the Class and the Court. After hearing from Class Members like you, the Court will decide whether to approve the Settlement.

As part of the proposed settlement, Defendants have agreed to stop collecting on the judgment against you forever. (But it is possible that someone else may collect on your judgment in the future. If you have a collection issue and need help understanding your rights under the Settlement, call the number or visit the website below).

You cannot get money from this settlement award, because Defendants' records show that you paid them less than \$1,000 and did not appear in Court to challenge the judgment. **If you think this is wrong – and that you did pay more than \$1,000, please call 1-800-578-9164.**

Your Legal Rights and Options in this Settlement

A. Do Nothing: If you do nothing, you will give up your rights to sue the Defendants on your own. But, Defendants will stop collecting on your account.

B. Object: To object, you must tell the court, in writing, what you do not like about the Settlement. Even if you object, you will get the benefits described above as long as you do not opt out. Due Date: September 20, 2022.

C. Opt Out: If you opt out, Defendants may keep collecting your account. But you could sue the Defendants on your own, at your own expense. Due Date: September 20, 2022.

To Learn More and Submit a Claim Form, Visit:

www.HouslangerSettlement.com

If you have other questions, you can contact the settlement administrator at 1-800-578-9164.

EXHIBIT C



FINAL NOTICE OF PAYMENT FROM CLASS ACTION SETTLEMENT

*Soto v. Houslanger & Associates, PLLC, et. al. , No. 19 Civ. 6691
United States District Court for the Eastern District of New York*

- You are eligible to receive payment from a Class Action Settlement! But to receive your payment, you must submit a claim form by September 20, 2022.
- You are receiving this notice because you have *already been identified* by Houslanger & Associates' records as a member of the *Soto v. Houslanger Settlement Class*, Case No. 19 civ 6691 (EDNY).
- This is the **final notice** from the Court appointed settlement administrator, Atticus Administration LLC.
- To file a claim, learn more about the Settlement, and view the original Court-Ordered copy of the settlement Notice, click the links below, visit [**www.HouslangerSettlement.com**](http://www.HouslangerSettlement.com), or call 1-800-578-9164.
- Your **claimant ID** is:
- Your **Last Name** on record is: Administration

Submit a Claim Form

Visit the Website

Atticus Administration | PO BOX 64053, ST PAUL, MN 55164

[Unsubscribe thebodyshopfacta@atticusadmin.com](#)

[Constant Contact Data Notice](#)

Sent by houslangersettlement@atticusadmin.com

You Can Receive Money From A Class Action Settlement If You File A Claim Now!

**Flip Over This Postcard For
Instructions About How To
Submit Your Claim And Receive
Your Payment.**

**HOUSLANGER SETTLEMENT
C/O ATTICUS ADMINISTRATION
PO BOX 64053
SAINT PAUL, MN 55164**



<<Claimant_ID>>

CLAIMANT ID: <<Claimant_ID>>

**<<First_Name>> <<Last_Name>>
<<Address1>> <<Address2>>
<<City>> <<State>> <<Zip>>**

YOU ARE ELIGIBLE TO RECEIVE PAYMENT FROM A CLASS ACTION SETTLEMENT!

- To receive your payment, you must submit a claim form by September 20, 2022.
- You are receiving this notice because you have ***already been identified*** by Houslanger & Associates' records as a member of the Soto v. Houslanger Settlement Class.
- This is the **final notice** from the Court appointed settlement administrator, Atticus Administration.
- To learn more and submit a claim form, visit:

www.HouslangerSettlement.com

- Your Claimant ID:
- Last Name on record:

If you have other questions, you can contact the Settlement Administrator at 1-800-578-9164.

You have been identified by Houslanger & Associates's records as a member of the Soto v. Houslanger Settlement Class, Case No. 19 Civ 6691 (EDNY). You are eligible to receive money from the settlement! [Your claimant ID is [XXXX]. You must file a claim form by September 20, 2022 to receive the money. To learn more and file a claim, visit www.houslangersettlement.com.

EXHIBIT D

RECEIVED SEP 19 2022

AHMAD KESHAVARZ
Attorney at Law

OPTOUT
3662971

16 COURT ST., 26TH FLOOR WWW.NEWYORKCONSUMERATTORNEY.COM
BROOKLYN, NY 11241-1026 E-mail: ahmad@NewYorkConsumerAttorney.com

Telephone: (718) 522-7900
Fax: (877) 496-7809

September 15, 2022

VIA Email to HouslangerSettlement@atticusadmin.com

AND VIA POSTAL MAIL TO:

Houslanger Settlement
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

**Re: *Soto v. Houslanger & Associates, PLLC, et al.*, No. 19 Civ. 6691
Opt-out of Carlos Villalba (Administrator of Estate of Ramon A. Galeas)
Name in Your Records: Ramon A. Galeas**

My office represents Carlos Villalba, Administrator of the Estate of Ramon A. Galeas, who is a class member of the *Soto v. Houslanger & Associates, PLLC* case. Mr. Villalba's contact information is as follows:

Carlos Villalba, 137 Semton Blvd., Franklin Square, NY 11010-4242
(917) 843-5827, vilcar@live.com

To make clear, your records probably indicate and that the class member is Ramon A. Galeas. But again, Mr. Galeas has passed away and our client Carlos Villalba has been appointed as the Administrator of the Estate of Mr. Galeas

As Mr. Villalba is represented by counsel in relation to this matter, please direct all correspondence to our office, preferably via email, at:

Ahmad Keshavarz, Esq.
175 Kingston Ave., # 2, Brooklyn, NY 11213-2001
Phone: (347) 308-4859 (mobile)
ahmad@NewYorkConsumerAttorney.com

The reason for the opt-out is that the class member currently has an individual FDCPA lawsuit against Mr. Houslanger and his firm. The caption of the case is Case 1:19-cv-04270-PKC-RLM, *Villalba v. Houslanger & Associates, PLLC et al.*, Eastern District of New York.

Please let me know if you have any questions.

Respectfully,

Ahmad Keshavarz

Ahmad Keshavarz

Digitally signed by Ahmad Keshavarz
On behalf of Ahmad Keshavarz, On-Law Office of Ahmad Keshavarz,
email:ahmad@NewYorkConsumerAttorney.com, c=US
Date: 2022.09.15 12:19:28 -04'00'

cc: Danielle Tarantolo via email to DTarantolo@nylag.org

LAW OFFICES OF
AHMAD KESHAVARZ

**16 COURT ST., 26TH FLOOR
BROOKLYN, NY 11241-1026**

15 SEP 2002 - PM 10:00



Houslanger Settlement
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

55164-005353

